UNITED STATES DISTRICT COURTSOUTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

FAISAL M. DAROD (1),

and

ADEN A. JAMA (2),

Defendants.

CASE NO

JUDGE

INDICTMENT

18 U.S.C. § 2113(a)

18 U.S.C. § 924(c)(1)(A)(i)

18 U.S.C. § 2(a)

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

COUNT 1 (Bank Robbery)

1. On or about July 6, 2023, in the Southern District of Ohio, the defendants, **FAISAL M. DAROD** and **ADEN A. JAMA**, by force, violence, and intimidation, did take from the person and presence of employees of Fifth Third Bank, Hilliard South Branch (located at 2455 Hilliard-Rome Road, Hilliard, Ohio), money in the amount of \$85,236.00, more or less, belonging to and in the care, custody, control, management, and possession of Fifth Third Bank, Hilliard South Branch, whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of 18 U.S.C. §§ 2113(a) and 2(a).

COUNT 2

(Use of a Firearm During and in Relation to a Crime of Violence)

2. On or about July 6, 2023, in the Southern District of Ohio, the defendants, FAISAL M. DAROD and ADEN A. JAMA did knowingly and intentionally use and carry a firearm, that is, a Glock, Model 17, 9mm handgun (S/N: ZLB578), during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, the robbery of the Fifth Third Bank, Hilliard South Branch, as charged in Count 1 of this Indictment, the allegations of which are incorporated here by reference.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2(a).

FORFEITURE ALLEGATION A

- 3. The allegations of the Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America under 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).
- 4. Upon conviction of the offense alleged in Count 1 of the Indictment, the defendants, **FAISAL M. DAROD** and **ADEN A. JAMA**, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, including, but not limited to, a sum of money equal to \$85,236.00 in United States currency.
- 5. <u>Substitute Assets</u>: If the forfeitable property described above, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;

has been substantially diminished in value; or d.

has been commingled with other property which cannot be e.

divided without difficulty,

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants, FAISAL M. DAROD and ADEN A. JAMA, up to the value of the

forfeitable property.

Forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION B

6. The allegations of the Indictment are hereby re-alleged and incorporated by

reference for the purpose of alleging forfeitures to the United States of America under

18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

7. Upon conviction of any of the offenses alleged in this Indictment, the

defendants, FAISAL M. DAROD and ADEN A. JAMA, shall forfeit to the United

States any firearms or ammunition involved or used in such offense(s), including, but

not limited to the following: a Glock, Model 17, 9mm handgun (S/N: ZLB578).

Forfeiture pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and

Rule 32.2 of the Federal Rules of Criminal Procedure.

Foreperson

KENNETH L. PARKER

UNITED STATES ATTORNEY

NOAH R. LITTON (0090479)

Assistant United States Attorney

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